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April 22, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: Proposed Settlement Agreements  
Involving Trinity  
(MM Docket Nos. 93-75, and 93-156; and  
File Nos. BRCT-940202KE, BPCT-940426KG,  
BRCT-931004KI, BTCCT-930921KN,  
BPCT-931230KF, BRCT-930730KF,  
BPCT-931028KS, BPCT-931101LF,  
BRCT-930402KH, BALTT-961107IA, and  
BRCT-911001LY)

Dear Ms. Salas:

This firm represents Simon T, applicant (File No. BPCT-931101LF) for a construction permit for a new UHF television station on Channel 40 in Santa Ana, California.

On April 13, 1998, the following pleadings were filed with the Commission, together with various proposed Settlement Agreements, each of which was also dated as of April 13, 1998:

1. Joint Request For Approval of Settlement Agreements by and among Glendale Broadcasting Company ("Glendale"); Maravillas Broadcasting Company ("Maravillas"); Trinity Broadcasting of Florida, Inc. ("TBF"); Trinity Christian Center of Santa Ana, Inc. ("TBN"); Trinity Broadcasting of New York, Inc. ("TBNY") and National Minority T.V., Inc. ("NMTV").

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2. Joint Request For Approval of Settlement Agreements by and among the League of United Latin American Citizens ("LULAC"); TBN; Trinity Broadcasting of Texas, Inc.; and NMTV.
3. Joint Request For Approval of Settlement Agreements by and among The Spanish American League Against Discrimination ("SALAD"); TBN; TBF; and NMTV.
4. Joint Request For Approval of Settlement Agreements by and among The California State Conference of Branches of the NAACP; the Alaska/Oregon/Washington State Conference of Branches of the NAACP; TBN; and NMTV.

In each of those pleadings, the aforementioned parties submit for Commission approval various Settlement Agreements which purport to resolve the differences among those parties to the license renewal proceedings involving the foregoing entities related to Trinity and involving Television Stations WHFT(TV), Miami, Florida; WHSG(TV), Monroe, Georgia; WTBY(TV), Poughkeepsie, New York; and KNMT(TV), Portland, Oregon. In addition, the aforementioned pleadings and Settlement Agreements purport to settle the differences among the aforementioned parties involving TBN's Television Station KTBN-TV, Santa Ana, California, except for the rather critical question of TBN's qualifications to continue to be a licensee and except for resolution of the pending application (File No. BPCT-931101LF) of our client, Simon T, for a construction permit for a new UHF television station on Channel 40 in Santa Ana, California. That application is mutually-exclusive with the pending application (File No. BRCT-930730KF) of TBN for renewal of license of Television Station KTBN-TV, Santa Ana, California. Moreover, Simon T's application is presently mutually-exclusive with the presently-pending application of Maravillas for a construction permit for a new UHF television station on Channel 40 in Santa Ana, California (File No. BPCT-931028KS).

Clearly, the most fundamental issue at the heart of the Trinity litigation is referenced above whether Trinity has the basic character qualifications to remain a Commission licensee. That issue cannot properly be resolved without input from Simon T, since his application for Santa Ana, California, is mutually-exclusive with the KTBN-TV license renewal application. Accordingly, Simon T's interests are vitally affected by the proposed Settlement Agreements referred to above and by the aforementioned Joint Requests in relation to those Settlement Agreements.

The Commission is hereby advised that Simon T intends to file an opposition to the aforementioned Joint Requests at the appropriate time contemplated by the Commission's Rules.

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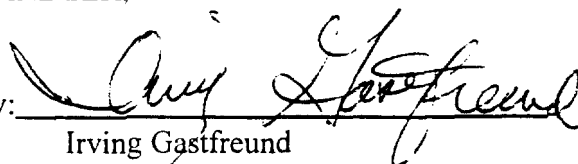
Accordingly, in light of the adversarial posture of this matter, pursuant to the Commission's ex parte rules (i.e., Sections 1.1200 - 1.1216 of the Commission's Rules), Simon T respectfully gives notice that each of the aforementioned Joint Requests should be deemed to be considered a contested "restricted proceeding" within the meaning of Section 1.1208 of the Commission's Rules; under that Rule, ex parte presentations are prohibited in such proceedings. Section 1.1208 of the Commission's Rules defines "restricted proceedings" to include, but not to be limited to, all proceedings that have been designated for hearing, applications for authority under Title III of the Communications Act, and all waiver proceedings (except for those directly associated with tariff filings which are not relevant here). It should be noted, in this regard, that the Joint Requests referenced above contemplate grant of certain Title III broadcast authority to TBN and its affiliates and that the Joint Requests seek certain waivers of the Commission's Rules and policies.

In light of all the foregoing, Simon T hereby respectfully submits that no ex parte "presentations", within the meaning of Section 1.1202 of the Commission's Rules, are to be made by any party with respect to any of the aforementioned Joint Requests, and that, in any event, any and all presentations to the Commission in any of the above-referenced Commission matters must be made exclusively in written, on-the-record submissions by such parties, and that copies of any and all such submissions must be immediately served on undersigned counsel for Simon T so that Mr. T may be afforded the opportunity of filing comments and responses to any such submissions.

In order to assure that an original and four copies of this letter are submitted in each of the above-referenced two dockets and in connection with each of the above-referenced eleven applications, an original and sixty-four copies of this submission are being tendered for filing with the Commission.

Respectfully submitted,

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By:   
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